



Department of Energy

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Mr Steve Tarlton
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4300 Cherry Creek Drive South
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Mr Tim Rehder
Rocky Flats Project Manager
U S Environmental Protection Agency
Region VIII
999 18th Street, Suite 500
Denver, Colorado 80202-2466

Dear Mr Tarlton and Mr Rehder

We have received your letter of October 6, 1997, transmitting your feedback on the Decommissioning Program Plan (DPP) of September 16, 1997, produced pursuant to the Rocky Flats Cleanup Agreement (RFCA). We regret that you have not found these documents to be sufficient to our joint purpose of making the decommissioning process at the Rocky Flats Environmental Technology Site (RFETS) more effective and efficient. The purpose of this letter is to delineate, from our standpoint, important regulatory issues surrounding the execution of the decommissioning program at RFETS, and to invite you to continue a dialogue that will resolve these issues in the context of finalizing the DPP.

We recognize that the structure of the documents submitted on September 16 (including a Facilities Disposition Management Plan (FDMP) and a RFCA Standard Operating Protocol (RSOP)) was quite different from the version of the DPP developed by the Building Disposition Working Group. In large part, our proposal to restructure the Working Group's document results from our belief that, notwithstanding the progress made by the Working Group, major issues had been left unresolved that were essential to the efficient execution of the decommissioning program at RFETS. These issues include the types of RFCA decision documents that will be produced for decommissioning projects, the level of detail contained in those documents, and the scope of activities that require decision documents under RFCA.

Regarding types of decision documents, as you state in your letter, there is considerable confusion regarding the content and purpose of the RSOP in the decommissioning process. There is fundamental disagreement among the various staffs as to whether an RSOP is to be developed to govern specific work activities (such as glovebox removal) or specific projects, such as decommissioning of an individual building. Given this amount of confusion, we propose not to produce RSOPs until our decommissioning

program is more mature, owing to the amount of effort that we believe it will take to define and give substance to these documents. We share in your desire to minimize the number of decision documents that must be produced by RFETS and subsequently reviewed and approved by you. We propose to continue to perform decommissioning work under the auspices of Proposed Action Memoranda (PAMs), Interim Measure/Interim Remedial Actions (IM/IRAs) or Decommissioning Operations Plans (DOPs). We suggest that PAMs and IM/IRAs can be written to cover multiple, similar buildings, minimizing the number of documents produced, reviewed and approved.

Regarding the level of detail to be contained in decision documents, there has been long-standing disagreement among our staffs as to what level of detail is required by the regulatory agencies in order to approve decommissioning at RFETS. Consistent with our proposal that project-specific decision documents (i.e., PAMs, IM/IRAs and DOPs) govern decommissioning work on a more specific basis, we proposed a DPP that served to describe facility disposition from a process standpoint, with much of the detail regarding activities relegated to the FDMP. We suggest that the Building 123 PAM and the upcoming Building 779 DOP, provide examples of the appropriate level of detail for decision documents governing work in these types of buildings. We further suggest that, when considered in combination with the DPP, these documents provide adequate detail to describe the decommissioning program as a whole at RFETS.

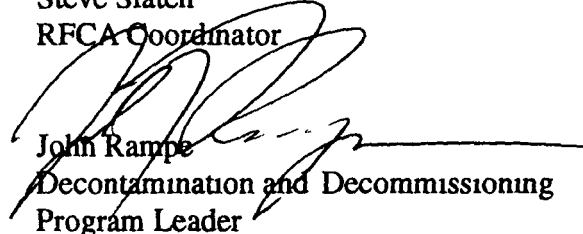
Your letter raises an issue of which decommissioning activities are "regulated under RFCA," and in doing so fundamentally misinterprets our concerns and our intentions in this area. Your contention that "all Type I and II buildings are currently in the decommissioning phase" is not explicitly supported in RFCA, and your assertion that regulator approval of characterization process and results is necessary is incorrect (see RFCA paragraph 120). While we apparently disagree on some philosophical aspects of RFCA regulation of RFETS activities, we do not believe that it is productive to argue those issues in the context of the DPP. Rather, we believe that it is essential to the efficient management of decommissioning projects that we clearly define those activities that require RFCA decision documents in order to proceed, and those that do not. The DPP proposes such activities, and during our discussions we will propose to you underlying criteria that we believe will be useful in defining such activities.

We believe that our meeting of October 16, 1997, was a productive first step in finally resolving these issues, and look forward to further meetings. Please note that John Rampe is now serving as our Decontamination and Decommissioning Program Leader, please ensure that he is included as an addressee on all matters relating to decommissioning. If you have any questions, please call John at 966-6246

Sincerely,



Steve Slaten
RFCA Coordinator



John Rampe
Decontamination and Decommissioning
Program Leader

cc

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